

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZIYAD SULEIMAN,

Defendant.

No. 1:02-cr-01166

Judge William T. Hart

DEFENDANT ZIYAD SULEIMAN'S MOTION FOR LEAVE TO TRAVEL

NOW COMES the Defendant, ZIYAD SULEIMAN, by through his attorney, JOHN T. THEIS, and moves this Honorable Court for an order granting Defendant leave to travel to the country of Israel from June 14 - 28, 2008, stating in support thereof as follows:

1. Defendant entered a plea of guilty on December 3, 2003 to the offense of fraud and was sentenced on July 28, 2004 to 26 months in custody;
2. Defendant completed the custody portion of his sentence and is currently on supervised release.
3. Defendant has recently learned that his father, Suleiman Suleiman, has suffered a heart attack and had open heart surgery; Defendant's father lives in the village of Tormusayya, in the Ramallah Region in the country of Israel.
4. Defendant wishes to travel to Israel to visit his father during his recovery, and currently wishes to travel from June 14 - 28, 2008.
5. If Defendant receives permission from this Court, Defendant will provide his supervising probation officer with specific information about his travel arrangements.

WHEREFORE, ZIYAD SULEIMAN, respectfully requests this Honorable Court enter an order granting Defendant leave to travel to the country of Israel from June 14 - 28, 2008.

Respectfully submitted,

s/John T. Theis

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CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants.

s/[John T. Theis]

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